



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

July 11, 2013

**FIRST CLASS MAIL**

Peggy Otum, Esq.  
Arnold & Porter, LLP  
555 Twelfth Street, NW  
Washington, DC 20004-1206

RE: North Penn Area 5 Superfund Site

Dear Peggy:

This letter responds to your March 12, 2013 letter on behalf of Honeywell International, Inc. ("Honeywell"), further arguing that Honeywell should be treated as a *de micromis* party under Section 107(o) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9607(o), in connection with the North Penn Area 5 Superfund Site ("Site"), or, in the alternative, be treated as a non-exempt *de micromis* party under EPA's November 6, 2002 "Revised Settlement Policy and Contribution Waiver Language Regarding Exempt *De Micromis* and Non-Exempt *De Micromis* Parties" ("De Micromis Policy"). EPA is not persuaded by the arguments re-iterated in your March 12 letter. Based on the currently-available information, EPA continues to consider Honeywell, as successor to Baron Blakeslee, Inc. ("BBI"), to be a potentially responsible party ("PRP") in connection with the Site.

**De Micromis Exemptions**

Section 107(o) of CERCLA, 42 U.S.C. § 9607(o), exempts persons whose liability is solely based on Section 107(a)(3) or (4) of CERCLA (i.e., liability based on arranging disposal or transporting hazardous substances) if the persons can demonstrate that the total amount of material containing hazardous substances that they arranged for disposal or treatment or transported for disposal or treatment was less than 110 gallons of liquid materials and that all or part of the disposal, treatment, or transport occurred before April 1, 2001. As discussed in EPA's October 24, 2012 letter in response to your August 17, 2012 letter, Honeywell is not liable solely as an arranger or transporter because its predecessor BBI not only delivered trichloroethene ("TCE") to Gas Spring Corporation at the Site and hauled spent TCE away, but from 1979 through 1986, BBI leased to Gas Spring the 1,000-gallon storage tank in which that TCE was stored.



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Your March 12 letter argues that EPA “concocted” a theory of ownership for which there is no evidence in the administrative record. However, EPA’s Remedial Investigation (“RI”) demonstrates that spills and/or leaks of TCE occurred in the area in which the storage tank was located and in the area of the 1979 release from the BBI delivery truck. For example, the RI revealed that TCE concentrations in the overburden groundwater in the area of the loading dock (where the spill occurred and where the storage tank was located) were in excess of 5 parts per million (“ppm”) in 1998. (See Enclosure 1, which shows TCE levels of 9 ppm at sampling location SB-28 and 6.7 ppm at location SB-26). In areas outside of the loading dock/storage tank area, the TCE concentrations were measured in parts per billion (“ppb”—i.e., the concentration of TCE was found to decrease as distance from the loading dock/storage tank area increased. The RI also revealed elevated levels of TCE in the soil—395 ppb in SB-28 and 251.37 ppb in SB-26. Although the RI concluded that soil locations sampled did not represent the major source area at the Stabilus facility—i.e., that the surface and sub-surface soils were not acting as a major source to the groundwater contamination—the levels of TCE in the surface soil along with the high levels of TCE in the overburden aquifer in this area do indicate that a release of TCE occurred in the location of the loading dock/storage tank that has significantly impacted the environment.

Your letter states that Honeywell finds EPA’s positions, as stated in the Agency’s October 24, 2012 letter, to be “unsupported by the relevant facts and applicable law and EPA guidance.” To the contrary, it is Honeywell’s arguments that are not supported by the facts. For example, Honeywell relies on the account of Mr. Harry Borchers to “demonstrate” that its contribution to contamination at the Site was *de micromis*. Mr. Borchers’ memorandum indicates that he observed TCE leaking from the flanges of a BBI delivery truck; “TCE was running across the running board and dripping into two 5-gallon buckets that had been placed by the driver to collect spillage;” “[t]he majority of the TCE found its way into the buckets, however small amounts did fall on the parking lot;” and “[a]ny quantity of TCE leaking from a vehicle at the location would find its way into a storm drain at the base of the unloading area.” Honeywell relies on Mr. Borchers’ description of the quantity of the TCE that leaked onto the parking lot as “small” and places emphasis on the description of a “majority,” which allegedly was captured in buckets. However, these descriptors are vague and comparative—“small” in comparison to what size leak? How much constitutes a “majority?” Honeywell also attempts to define the term “drip” as it was used by Mr. Borchers by performing a purportedly scientific analysis based on a series of unknowable, and therefore unverifiable and unreliable, assumptions ranging from the delivery truck’s pumping rate to the porosity of the rock matrix beneath the Site.

Contrary to the assertions in your March 2013 letter, EPA has not ignored Mr. Borchers’ statements or selectively chosen certain statements on which to rely. Instead, the Agency has relied on the data collected during the RI about actual conditions at the Site to inform its position, as well as Mr. Borchers’ descriptive statement that the TCE was running along the delivery truck’s running board. While this statement does not provide a concrete description of the amount of TCE that leaked during the 1979 spill event, it, considered collectively with the data showing that the levels of TCE contamination in the loading dock area are orders of magnitude greater than other locations, contradicts Honeywell’s assertions that such spill was *de micromis*.

Finally, your March 2013 letter posits that EPA is ignoring data submitted by Honeywell which suggests that certain contamination in the area of the Site known as Operable Unit 2 ("OU2") is attributable to contamination that has migrated from the facility formerly owned and operated by BAE. EPA's October 2012 letter makes no statements or conclusions regarding whether and to what extent BAE or its predecessor corporations contributed to contamination at OU2 at the Site. Further, EPA has considered the data submitted by Honeywell, which was submitted to the Agency in 2004; however, EPA does not believe that the data impacts the Agency's conclusion as to the application of the statutory *de micromis* provision or *De Micromis* Policy as to Honeywell.

In a matter involving events that occurred more than 30 years ago, there is bound to be some uncertainty, as Honeywell itself recognizes in your March 2013 letter. However, EPA will not automatically resolve this uncertainty in favor of Honeywell in the face of evidence of elevated levels of contamination in the location of the 1979 spill and the BBI-owned storage tank. If data collected during the further delineation of the OU2 overburden and during the implementation of the OU2 Interim ROD provides information indicating that Honeywell's contribution to the contamination at OU2 was *de micromis*, EPA will re-visit its position. Until then, the Agency continues to consider Honeywell to be a PRP for the Site.

Sincerely,



Allison F. Gardner  
Senior Assistant Regional Counsel

Enclosure

vicinity of the sewer line. Further, there is no evidence from historical videotape investigations of the sewer in the Stabilus area that this conduit has leaked large quantities of effluent to the ground water or conveyed large quantities of ground water through infiltration to the sewer. Therefore, there is no evidence that the main sewer located behind the Stabilus facility is a source area for the TCE in the area.

#### 4.2.7.2 TCE Spill Area and Waste Storage Area

Based on the observations of a TCE spill in the Stabilus parking lot reported in 1980, the source area assessment activities focused initially on the southeastern corner of the building, near the loading dock for the Stabilus facility. It was assumed that this was the location of the "spill" since this is the closest location to the reported TCE AST that was located inside the building. The source assessment activities included direct push soil and ground-water sampling and surface soil sampling in the area draining the waste storage area in 1998, and a supplemental direct push investigation using a membrane-interface probe (MIP) and soil sampling conducted in 2002 to provide additional site information.

##### Direct Push Ground-Water Results

The results of the direct push ground-water sampling effort are summarized on Figures 4-20 (TCE Concentration Map - Overburden Aquifer), 4-21 (1,2-DCE Concentration Map - Overburden Aquifer), and 4-22 (1,1-DCE Concentration Map - Overburden Aquifer). The results are presented in Appendix H7. The major observations of the nature and extent of TCE and breakdown products in the overburden aquifer are:

- Ground-water concentrations in excess of 5 mg/l were detected in the overburden aquifer at the Stabilus site. The highest concentrations were detected in the vicinity of the loading dock and waste storage areas, as well as the southeastern corner of the building. The source area for the TCE is probably coincident with these high concentration areas.
- The TCE concentrations appear to extend radially in all directions, except to the south, from the high concentration area described above.
- The TCE breakdown products 1,2-DCE and 1,1-DCE are also present, but at much lower concentrations and limited in extent to the area that encompasses the highest TCE concentrations, which is assumed to be the source area.

##### Direct Push Soil Results

The results of the direct push soil sampling effort are summarized on Figure 4-23 (TCE Concentration Map - Subsurface Soil). The results are presented in Appendix H7. The major observations of the nature and extent of TCE and breakdown products in the subsurface soil as delineated by the direct push soil borings and mobile laboratory analysis are:

- The concentrations of TCE detected in the subsurface soil are relatively low compared to the ground-water concentrations. The highest concentration detected was ~600 µg/kg at location SB-02, with only a few other locations containing TCE with concentrations in excess of 100 µg/kg. These sample results

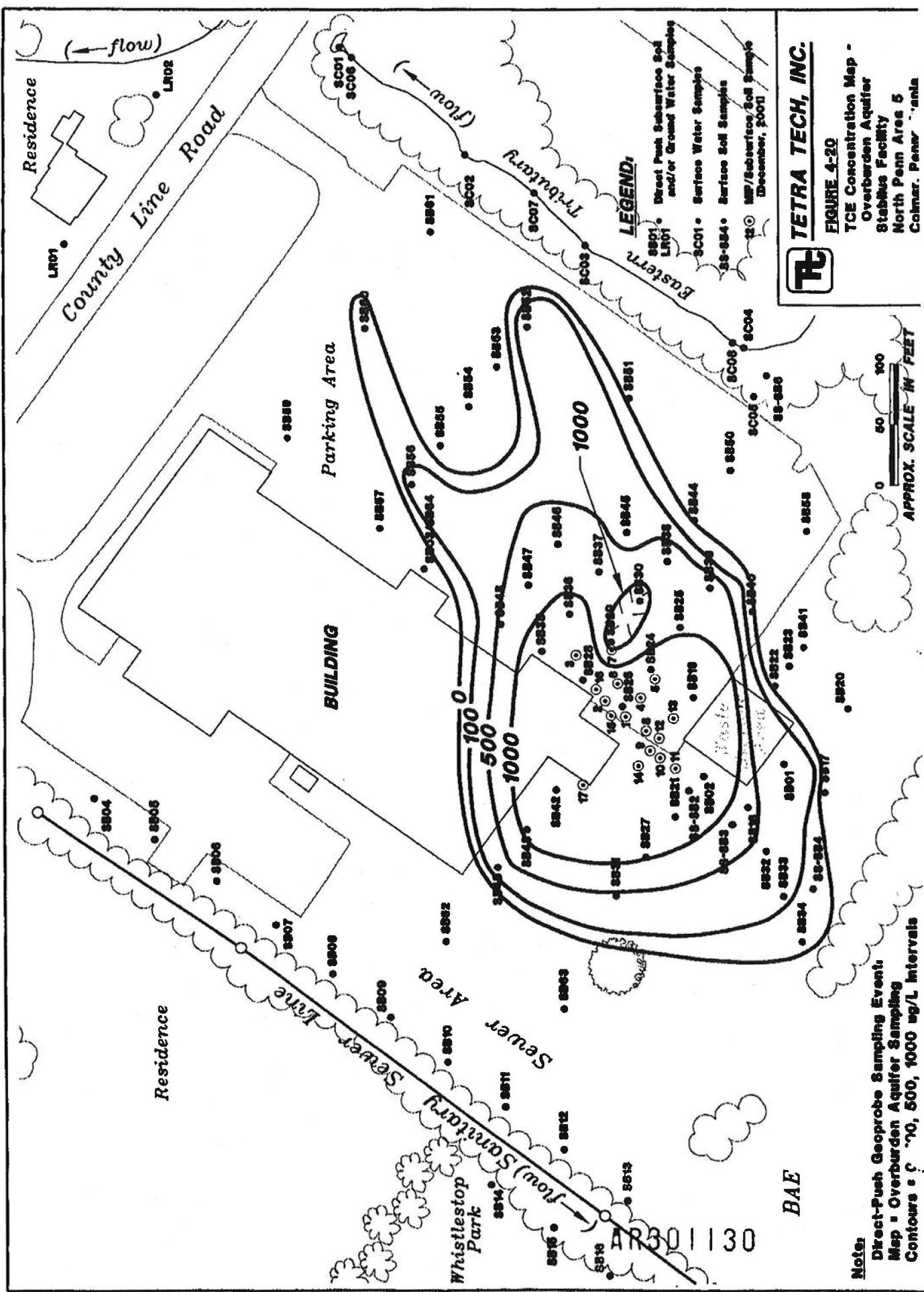
**TETRA TECH, INC.**

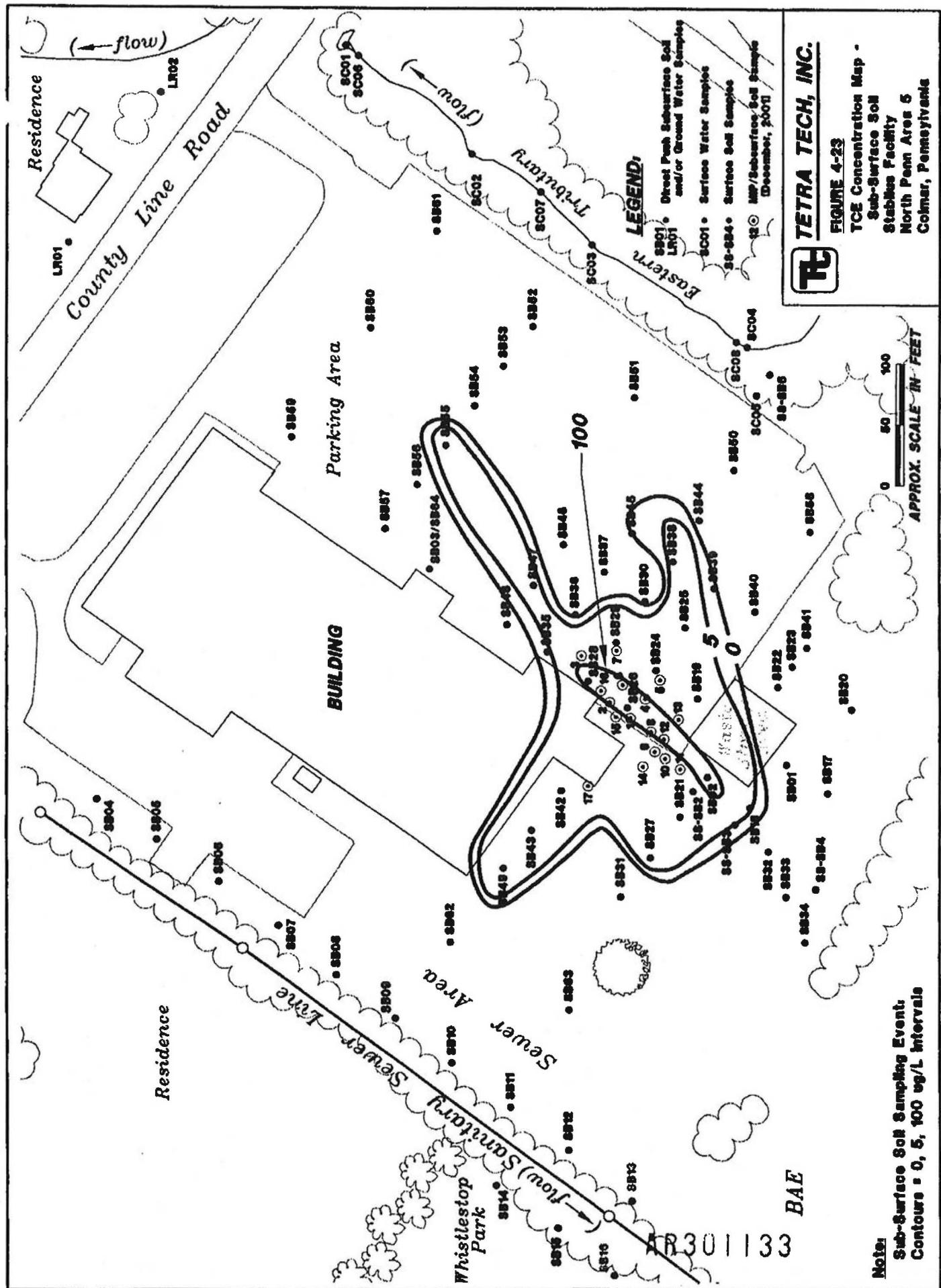
FIGURE 4-20

TCE Concentration Map -  
Overburden Aquifer  
Status Facility  
North Penn Area 5  
Colmar, Penn - anal



APPROX. SCALE 1M FEET





**TETRA TECH, INC.**

**FIGURE 4-23**  
**TCE Concentration Map -**  
**Sub-Surface Soil**  
**Stabilized Facility**  
**North Penn Area 5**  
**Colmar, Pennsylvania**

**North Penn Area 5 Analytical Results**  
**Stabilus - Aqueous - Volatile Organic Compounds (ug/l)**

STATION ID	NPS-XW-SB20-598 ppb MY209628	NPS-XW-SB22-598 ppb MY219812	NPS-XW-SB23-598 ppb MY219813	NPS-XW-SB24-598 ppb MY279804	NPS-XW-SB25-598 ppb MY279808	NPS-XW-SB26-598 ppb MY279807	NPS-XW-SB27-598 ppb JN089811	NPS-XW-SB28-598 ppb JN019817
Volatile Organic Compound								
Acetone								
Benzene	5U							
Bromobenzene	5U							
Bromo-chloromethane	5U							
Bromo-dichloromethane	5U							
Bromoform	5U							
Bromo-methane	5U							
Butanone(2-)								
Butylbenzene(n-)	5U							
Butylbenzene(sec-)	5U							
Butylbenzene(tert-)	5U							
Carbon Disulfide								
Carbon Tetrachloride	5U							
Chlorobenzene	5U							
Chlorodibromomethane	5U							
Chloroethane	5U							
Chloroform	5U							
Chloromethane	5U							
Chlorotoluene(2-)	5U							
Chlorotoluene(4-)	5U							
Dibromo-3-chloropropane(1,2-)	5U							
Dibromochloromethane								
Dibromoethane(1,2-)	5U							
Dibromomethane	5U							
Dichlorobenzene(1,2-)	5U							
Dichlorobenzene(1,3-)	5U							
Dichlorobenzene(1,4-)	5U							
Dichlorodifluoromethane	5U							
Dichloroethane(1,1-)	5U	4.22						
Dichloroethane(1,2-)	5U							
Dichloroethene (total)(1,2-)								
Dichloroethene(1,1-)	5U	5U	5U	5U	5U	15.14	5U	30.5
Dichloroethene(cis-1,2-)	5U	5U	5U	72.7	67.7	1020 E	72.1	2150 E
Dichloroethene(trans-1,2-)	5U	5U	5U	6U	5U	8.15	5U	15.2
Dichloropropane(1,2-)	5U							
Dichloropropane(1,3-)	5U							
Dichloropropane(2,2-)	5U							
Dichloropropene(1,1-)	5U							
Dichloropropene(cis-1,3-)	5U							
Dichloropropene(trans-1,3-)	5U							
Ethylbenzene	5U							
Hexachlorobutadiene	5U							
Heptane(2-)								
Isopropylbenzene	5U							
Isopropyltoluene(p-)	5U							
Methyl-1-Butyl Ether								
Methyl-2-Pentanone(4-)								
Methylene Chloride	18.74 B	5.71 B	6.3 B	5U	5U	5U	5U	11.58 B
Naphthalene	5U							
Propylbenzene(n-)	5U							
Styrene	5U							
Tetrachloroethane(1,1,1,2-)	5U							
Tetrachloroethane(1,1,2,2-)	5U							
Tetrachloroethene (PCE)	5U	5U	5U	5U	5U	13.2	5U	26.1
Toluene	5U							
Trichlorobenzene(1,2,3-)	5U							
Trichlorobenzene(1,2,4-)	5U							
Trichloroethane(1,1,1-)	5U	5U	5U	5U	5U	19.3	5U	17.9
Trichloroethane(1,1,2-)	5U							
Trichloroethene (TCE)	5U	5U	5U	1460 E	995 E	8720 E	1940 E	9230 E
Trichlorofluoromethane	5U							
Trichloropropane(1,2,3-)	5U							
Trimethylbenzene(1,2,4-)	5U							
Trimethylbenzene(1,3,5-)	5U							
Vinyl Chloride	5U	5U	5U	5U	5U	24.7	5U	167
Xylene(o-)								
Xylenes(m+p-)								
Xylenes(Total)	5U							

MATRIX	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER
DATE SAMPLED	5/20/1998	5/21/1998	5/21/1998	5/27/1998	5/27/1998	5/27/1998	6/8/1998	6/1/1998
DATE ANALYZED	5/20/1998	5/21/1998	5/21/1998	5/27/1998	5/27/1998	5/27/1998	6/8/1998	6/1/1998
TIME ANALYZED	0033	1447	1521	1044	1150	1221	1447	1819
Dilution Factor	1	1	1	1	1	1	1	1

**North Penn Area 5 Analytical Results - Source Area Assessment**  
**Stabilius - Solid - Volatile Organic Compounds (ug/kg)**

STATION ID	NP5-SL-SB21- 10-598 ppb MY219808	NP5-SL-SB22- 7.5-598 ppb MY219807	NP5-SL-SB23- 9.3-598 ppb MY219809	NP5-SL-SB24- 12.0-598 ppb MY279833	NP5-SL-SB25- 15.5-598 ppb MY279834	NP5-SL-SB26- 11.5-598 ppb MY279835
Volatile Organic Compound						
Acetone						
Benzene	5U	5U	5U	5U	5U	5U
Bromobenzene	5U	5U	5U	5U	5U	5U
Bromochloromethane	5U	5U	5U	5U	5U	5U
Bromodichloromethane	5U	5U	5U	5U	5U	5U
Bromoform	5U	5U	5U	5U	5U	5U
Bromomethane	5U	6U	5U	5U	5U	5U
Butanone(2-)						
Butylbenzene(n-)	5U	5U	5U	5U	5U	5U
Butylbenzene(sec-)	5U	5U	5U	5U	5U	5U
Butylbenzene(tert-)	5U	5U	5U	5U	5U	5U
Carbon Disulfide						
Carbon Tetrachloride	5U	5U	5U	5U	5U	5U
Chlorobenzene	5U	5U	5U	5U	5U	5U
Chlorodibromomethane	5U	5U	5U	5U	5U	5U
Chloroethane	5U	5U	5U	5U	5U	5U
Chloroform	5U	4.33 J	3.60 J	5U	5U	5U
Chloromethane	5U	5U	5U	5U	5U	5U
Chlorotoluene(2-)	5U	5U	5U	5U	5U	5U
Chlorotoluene(4-)	5U	5U	5U	5U	5U	5U
Dibromo-3-chloropropane(1,2-)	5U	5U	5U	5U	5U	5U
Dibromochloromethane						
Dibromoethane(1,2-)	5U	5U	5U	5U	5U	5U
Dibromomethane	5U	5U	5U	5U	5U	5U
Dichlorobenzene(1,2-)	5U	5U	5U	5U	5U	5U
Dichlorobenzene(1,3-)	5U	5U	5U	5U	5U	5U
Dichlorobenzene(1,4-)	5U	5U	5U	5U	5U	5U
Dichlorodifluoromethane	5U	5U	5U	5U	5U	5U
Dichloroethane(1,1-)	5U	5U	5U	5U	5U	5U
Dichloroethane(1,2-)	5U	5U	5U	5U	5U	5U
Dichloroethane(1,2-)(tot)	5U	5U	5U	5U	5U	5U
Dichloroethane(1,1-)	5U	5U	5U	5U	5U	5U
Dichloroethylene(cis-1,2-)	5U	5U	5U	5U	5U	17.77
Dichloroethene(trans-1,2-)	5U	5U	5U	5U	5U	5U
Dichloropropene(1,2-)	5U	5U	5U	5U	5U	5U
Dichloropropene(1,3-)	5U	5U	5U	5U	5U	5U
Dichloropropene(2,2-)	5U	5U	5U	5U	5U	5U
Dichloropropene(1,1-)	5U	5U	5U	5U	5U	5U
Dichloropropene(cis-1,3-)	5U	5U	5U	5U	5U	5U
Dichloropropene(trans-1,3-)	5U	5U	5U	5U	5U	5U
Ethylbenzene	5U	5U	5U	5U	5U	5U
Hexachlorobutadiene	5U	5U	5U	5U	5U	5U
Heptane						
Heptane(2-)						
Isopropylbenzene	5U	5U	5U	5U	5U	5U
Isopropyltoluene(p-)	5U	5U	5U	5U	5U	5U
Methyl-1,2-Pentanone(4-)						
Methylene Chloride	5U	5U	5U	5U	5U	5U
Naphthalene	5U	5U	5U	5U	5U	5U
Propylbenzene(n-)	5U	5U	5U	5U	5U	5U
Styrene	5U	5U	5U	5U	5U	5U
Tetrachloroethane(1,1,1,2-)	5U	5U	5U	5U	5U	5U
Tetrachloroethane(1,1,2,2-)	5U	5U	5U	5U	5U	5U
Tetrachloroethene (PCE)	5U	5U	5U	5U	5U	5U
Toluene	5U	5U	5U	5U	5U	5U
Trichlorobenzene(1,2,3-)	5U	5U	5U	5U	5U	5U
Trichlorobenzene(1,2,4-)	5U	5U	5U	5U	5U	5U
Trichloroethane(1,1,1-)	5U	5U	5U	5U	5U	5U
Trichloroethane(1,1,2-)	5U	5U	5U	5U	5U	5U
Trichloroethene (TCE)	28.7	5U	28.7	99.57	6.40	251.37
Trichlorofluoromethane	5U	5U	5U	5U	5U	5U
Trichloropropene(1,2,3-)	5U	5U	5U	5U	5U	5U
Trimethylbenzene(1,2,4-)	5U	5U	5U	5U	5U	5U
Trimethylbenzene(1,3,5-)	5U	5U	5U	5U	5U	5U
Vinyl Chloride	5U	5U	5U	5U	5U	5U
Xylenes(Total)	5U	5U	5U	5U	5U	5U

MATRIX	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL
DATE SAMPLED	5/21/1998	5/21/1998	5/21/1998	5/27/1998	5/27/1998	5/27/1998
DATE ANALYZED	5/21/1998	5/21/1998	5/21/1998	5/28/1998	5/28/1998	5/28/1998
TIME ANALYZED	1202	1127	1235	0444	0526	0602
Dilution Factor	1	1	1	1	1	1

AR301784

**North Penn Area 5 Analytical Results - Source Area Assessment**  
**Stabilus - Solid - Volatile Organic Compounds (ug/kg)**

STATION ID	NP5-SL-SB27- 8.5-698 ppb JN029811	NP5-SL-SB28- 10.5-698 ppb JN029812	CLP CONFIRMATORY SL-SB28-10.5-698 CTM74		NP5-SL-SB29- 8.0-698 ppb JN029813	NP5-SL-SB30- 10.0-698 ppb JN029814	NP5-SL-SB31- 12.5-698 ppb JN029815
			CLP	CONFIRMATORY			
Volatile Organic Compound							
Acetone			4	B			
Benzene	5U	5U	11	R	5U	5U	5U
Bromobenzene	5U	5U			5U	5U	5U
Bromoform	5U	5U	11	R	5U	5U	5U
Bromomethane	5U	5U	11	R	5U	5U	5U
Butanone(2-)			11	R			
Butylbenzene(n-)	5U	5U			5U	5U	5U
Butylbenzene(sec-)	5U	5U			5U	5U	5U
Butylbenzene(tert-)	5U	5U			5U	5U	5U
Carbon Disulfide			11	R			
Carbon Tetrachloride	5U	5U	11	R	5U	5U	5U
Chlorobenzene	5U	5U	11	R	5U	5U	5U
Chlorodibromomethane	5U	5U			5U	5U	5U
Chloroethane	5U	5U	11	R	5U	5U	5U
Chloroform	5U	5U	11	R	5U	5U	5U
Chloromethane	5U	5U	11	R	5U	5U	5U
Chlorotoluene(2-)	5U	5U			5U	5U	5U
Chlorotoluene(4-)	5U	5U			5U	5U	5U
Dibromo-3-chloropropane(1,2-)	5U	5U			5U	5U	5U
Dibromochloromethane			11	R			
Dibromoethane(1,2-)	5U	5U			5U	5U	5U
Dibromomethane	5U	5U			5U	5U	5U
Dichlorobenzene(1,2-)	5U	5U			5U	5U	5U
Dichlorobenzene(1,3-)	5U	5U			5U	5U	5U
Dichlorobenzene(1,4-)	5U	5U			5U	5U	5U
Dichlorodifluoromethane	5U	5U			5U	5U	5U
Dichloroethane(1,1-)	5U	5U	11	R	5U	5U	5U
Dichloroethane(1,2-)	5U	5U	11	R	5U	5U	5U
Dichloroethylene (total)(1,2-)			11	R			
Dichloroethylene(1,1-)	5U	5U	11	R	5U	5U	5U
Dichloroethene(cis-1,2-)	5U	52.0			5U	5U	5U
Dichloroethylene(trans-1,2-)	5U	5U			5U	5U	5U
Dichloropropane(1,2-)	5U	5U	11	R	5U	5U	5U
Dichloropropane(1,3-)	5U	5U			5U	5U	5U
Dichloropropene(2,2-)	5U	5U			5U	5U	5U
Dichloropropene(1,1-)	5U	5U			5U	5U	5U
Dichloropropene(cis-1,3-)	5U	5U	11	R	5U	5U	5U
Dichloropropene(trans-1,3-)	5U	5U	11	R	5U	5U	5U
Ethylbenzene	5U	5U	11	R	5U	5U	5U
Hexachlorobutadiene	5U	5U			5U	5U	5U
Hexanone(2-)			11	R			
Isopropylbenzene	5U	5U			5U	5U	5U
Isopropyltoluene(p-)	5U	5U			5U	5U	5U
Methyl-2-Pentanone(4-)			11	R			
Methylene Chloride	5U	5U	2	B	5U	5U	5U
Naphthalene	5U	5U			5U	5U	5U
Propylbenzene(n-)	5U	5U			5U	5U	5U
Styrene	5U	5U	11	R	5U	5U	5U
Tetrachloroethane(1,1,1,2-)	5U	5U			5U	5U	5U
Tetrachloroethane(1,1,2,2-)	5U	5U	11	R	5U	5U	5U
Tetrachloroethylene (PCE)	5U	5U	11	R	5U	5U	5U
Toluene	5U	5U	11	R	5U	5U	5U
Trichlorobenzene(1,2,3-)	5U	5U			5U	5U	5U
Trichlorobenzene(1,2,4-)	5U	5U			5U	5U	5U
Trichloroethane(1,1,1-)	5U	5U	11	R	5U	5U	5U
Trichloroethane(1,1,2-)	5U	5U	11	R	5U	5U	5U
Trichloroethene (TCE)	13.1	395.9	2	I	35.8	5U	5U
Trichlorofluoromethane	5U	5U			5U	5U	5U
Trichloropropane(1,2,3-)	5U	5U			5U	5U	5U
Trimethylbenzene(1,2,4-)	5U	5U			5U	5U	5U
Trimethylbenzene(1,3,5-)	5U	5U			5U	5U	5U
Vinyl Chloride	5U	5U	11	R	5U	5U	5U
Xylenes(Total)	5U	5U	11	R	5U	5U	5U

MATRIX  
DATE SAMPLED  
DATE ANALYZED  
TIME ANALYZED  
Dilution Factor

SOIL  
6/2/1998  
6/2/1998  
1724  
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